

From: [Moore, Gary](#)
To: ["Don Edgington"; Evan Wortman](#)
Cc: [Delgado, Paige](#)
Subject: RE: DLWN: Special Waste Workflow 10/31/2018 3:45:51 PM/INCOMPLETE: Addtl Information Required - US EPA - Region 6 Profile 34161818258
Date: Thursday, November 01, 2018 6:09:45 PM

Don/Evan: The following is what I want to send to Cheryl to update the information submitted by Don. Also, I do not think we are ready to get the profile approved because we don't have the necessary data to support the disposal of the C&D material (ie. wood and concrete). We do have sheet metal wipes but only for PCBs as well as a paint sample for Aroclor 1268 and Lead. We need to talk about this and to Chris/Cheryl to determine what they are going to need for disposal of this debris. I am going to wait until we talk further about this. I would like to get on a conference call with you and Evan so we can talk through this.

Also, I just noticed that the Special Waste Profile had the wrong facility address. Should be 905 N. Poplar not 903. Also, did we need to put the State Registration Number in the profile?

Thanks
Gary Moore

Hello Cheryl:

I wanted to provide some supplemental information to the information provided by Don Edgington, EPA Contractor, provided you earlier today to try to answer your questions:

1. **What purpose was the building used on site?** This building was used as FJ Doyle Salvage from approximately 1976 to 1999. I was told that the transformers were empty (contained residual transformer oil) when they came to the site. The residual transformer oil was drained into a pan on the floor of the building and then pumped into outside tanks. The transformers were then dismantled to remove the metal parts for recycling as well as recycling of the transformer carcasses. After 1999, I was told that the property was used to store old trucks and parts and then as an auto repair facility and finally just for storage.
2. **What activities or processes occurred in the building?** See information in question 1 above.
3. **What possible contaminants may have been used in it?** A reasonable assumption is that some organic materials may have been spilled (transformer oil, auto fluids, etc. on the building floor, probable copper, lead and other minute amounts of metals from the metal salvage activities.
4. **How was it determined that no contamination exists in the materials that is to be disposed?** See attached analytical report; specifically analyses on 16 wipe samples taken from sheet metal both inside and out including interior ceiling areas inside the structure to be demolished. The concrete and wood debris will have to be sampled to determine the appropriate waste stream.
5. **Please have the generator describe their process for ensuring no contaminated materials is designated for inclusion with C&D for disposal. Additional analytical may be required.** The building will be removed in small, discrete sections and visually assessed for any staining or abnormalities. Debris will be further segregated into metals, concrete, and wooded stockpiles

and further evaluated prior to loading. Analytical is anticipated to be performed on a representative sample of the wood and concrete debris to determine the appropriate landfill. It is highly unlikely that representative sample of the debris will show the C&D material will be hazardous, or TSCA regulated.

Attachment: ALS Laboratories Final Report – HST 18100338 Final Level II.

All of the wipe samples (16) were taken from various locations on the building and were collected by Weston Solutions, Inc. representatives.

From: Don Edgington <d.edgington@erllc.com>
Sent: Thursday, November 01, 2018 1:28 PM
To: Muegge, Cheryl <CMuegge@republicservices.com>
Cc: Alderete, Chris <CAlderete@republicservices.com>; Moore, Gary <Moore.Gary@epa.gov>; Delgado, Paige <Delgado.Paige@epa.gov>; Evan Wortman <e.wortman@erllc.com>
Subject: RE: DLWN: Special Waste Workflow 10/31/2018 3:45:51 PM/INCOMPLETE: Addt'l Information Required - US EPA - Region 6 Profile 34161818258

Cheryl—

Answering your questions in order:

1. **What purpose was the building used on site?** The building formerly housed F.J. Doyle Salvage, which was a concern involved with recycling out-of-service power transmission transformers for recoverable metals.
2. **What activities or processes occurred in the building?** As the site has been abandoned for several years, it is our assumption that drained carcasses and commercially viable metals were stored inside and probable disassembly of the drained carcasses ensued to recycle same.
3. **What possible contaminants may have been used in it?** Again, our assumption is that some organic wastes may have been spilled inside the building's floor, probable copper, lead and other minute amounts of metals.
4. **How was it determined that no contamination exists in the materials that is to be disposed?** See attached analytical report; specifically analyses on 16 wipe samples taken from wood, metal and concrete areas inside the structure to be demolished.
5. **Please have the generator describe their process for ensuring no contaminated materials is designated for inclusion with C&D for disposal. Additional analytical may be required.** The building will be removed in small, discrete sections and visually assessed for any staining or abnormalities. Debris will be further segregated into metals, concrete, glass and wooded stockpiles and further evaluated prior to loading.

Attachment: ALS Laboratories Final Report – HST 18100338 Final Level II.

All of the wipe samples (16) were taken from various locations on the building and were collected by

Weston Services, Inc. representatives.

If you have any other questions/comments, please advise.

Regards,

Don

From: Muegge, Cheryl <CMuegge@republicservices.com>

Sent: Thursday, November 01, 2018 10:57 AM

To: Don Edgington <d.edgington@erllc.com>

Cc: Alderete, Chris <CAlderete@republicservices.com>

Subject: FW: DLWN: Special Waste Workflow 10/31/2018 3:45:51 PM/INCOMPLETE: Addt'l
Information Required - US EPA - Region 6 Profile 34161818258

Don,

We have received an incomplete on the United States Environmental Protection Agency
Region 6 / Construction & Demolition Debris Profile 34161818258 citing:

“Please have the generator add more details to their process generating waste: for what
purpose was the building used on-site? What activities or processes occurred in the building?
What possible contaminants may have been used in it? How was it determined that no
contamination exists in the material that is to be disposed? Please have the generator
describe their process for ensuring no contaminated material is designated for disposal.
Additional analytical may be required.”

“What is the metal that constitutes up to 30% of the waste? Please have the generator
describe.”

Thank you,

Cheryl Muegge

Sales Coordinator - Special Waste

2815 State Hwy 42 N

Kilgore, TX 75662

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RS_EMAIL_SIGNATURE_LOCKUP_1



From: workflow

Sent: Wednesday, October 31, 2018 9:17 AM

To: Muegge, Cheryl <CMuegge@republicservices.com>

Subject: DLWN: Special Waste Workflow 10/31/2018 3:45:51 PM/INCOMPLETE: Addt'l Information Required

REPOSITORY: Corporate
USER: System Admin (cssadmin)
ACTIVITY: Notify Users

MESSAGE:

Please review the appended notes on the Special Waste Profile package for missing information. Please then email the missing information to the analyst that declined this Special Waste Profile package.

LAST COMPLETED WORKFLOW STEP:

REQUEST FOR APPROVAL: Analyst Review

COMPLETED WORKFLOW STEP:

Joseph Sorokach VOTE: 02 - Insufficient Information

No Comments

WORKFLOW DETAIL:

INSTANCE NAME: Special Waste Workflow 10/31/2018 3:45:51 PM
ROUTE NAME: Special Waste Workflow
STEP NAME: INCOMPLETE: Addt'l Information Required
SUBMITTER NAME: Cheryl Muegge
STEP STARTED: 10/31/2018 2:16:34 PM
STEP DUE DATE: 11/7/2018 7:00:00 PM

WebTools:

<http://locator/default.aspx?WFRow=98CC0FD3-0962-44A7-8178-4A7FE4663B86&WFStep=2&WFRoute=4>

ROUTE INSTRUCTIONS:

This workflow is designed to support Special Waste Profile packages that are submitted by Coordinators. The workflow does the following:

- 1) The Special Waste Profile is routed to the Analysts Queue.
- 2) The Analyst reviews the Profile Package and either selects 01 - Approved the Request, 02 - Insufficient Information, or 03 - Inacceptable Material.
- 3) If options of 01 or 03 are selected (Approved or Rejected), the Coordinator is notified. If 02 - Insufficient Information is selected the Coordinator is assigned a workflow task to send the Analyst additional information.
- 4) Once the Profile is officially approved or rejected, the support document is named using an autopath and then moved to an archive folder.

STEP INSTRUCTIONS:

Please review the appended notes on the Special Waste Profile package for missing information. Please then email the missing information to the analyst that declined this Special Waste Profile package.

FILES RELATED TO ACTIVITY:

Corporate\Documents\Special Waste_In Process\34161818258_United States Environmental Protection Agency - Region 6_2018-10-31.pdf

WebTools: <http://locator/default.aspx?id=D2273E26152F463D867FCA5FA72E876E&dir=Objects>

DETAILED FILE INFORMATION:

DESCRIPTION:

VERSION ID: 2.0
STATUS: Normal
LAST UPDATED: 10/31/2018 2:16:28 PM
LAST ACCESSED: 10/31/2018 2:16:28 PM
VERSION DATE: 10/31/2018 2:16:28 PM
VERSION NOTES:

PROFILE PROPERTY INFORMATION:

PROFILE: SpecialWaste
Lawson Co#: 3416
SW Profile#: 34161818258
SW DocType: Original Documents
Document Date: 10/31/2018
SW Generator: United States Environmental Protection Agency - Region 6
SW Sales Rep: Chris Alderete
SW Coordinator: Cheryl Muegge
SW Waste Stream: 75452

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